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File # 2.7
Per: _____

Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

4330

November 1, 1991

BY TELEFAX

Mr. Larry Brannen
On-Scene Coordinator
USEPA Region IV
345 Courtland St., N.E.
Atlanta, GA 30365

OCD-WCU-91-0254

Orange County - WCU
Chevron Chemical Company Site -- Orlando
Site Dewatering as Part of Soil Removal Under AOC.
EPA Docket No. 90-37-C

Dear Mr. Brannen:

Per our telephone conversation this morning, here are some immediately obvious concerns about the referenced project. Please bear in mind that a more detailed review may result in additional comments.

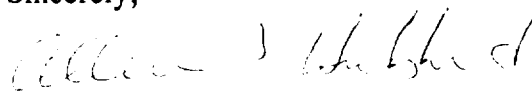
1. The Removal Action Plan (RAP) does not incorporate engineering design documentation on the treatment system for groundwater from dewatering. Only conceptual design information is provided. As a result, there is no design-based reasonable assurance that the system can meet the groundwater treatment goals listed in Table 4-7 of the RAP.
2. The Respondent's plans for discharge of treated effluent are similarly vague. The RAP does not identify where the onsite discharge will occur. The method of discharge is described in a single sentence as "exfiltration," a term which can encompass a variety of specific design considerations.

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9. Based on the removal goals noted in item No. 8, removal below the water table is not a requirement of a CERCLA response action. Thus, there is little reason for the Respondent to believe that it is exempted from Florida Statutes and regulations by CERCLA.

Following our telephone conversation this morning, we faxed a copy of the Department's October 30, 1991 letter to Chevron Chemical Company. Please contact either me or Bill McKenty with any questions. Thank you for your attention to this matter.

Sincerely,



Allen P. Hubbard, P.E.
Waste Cleanup Section Manager

cc: Gary Early, OGC
Nick Sassic, OCEPD